

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

V.

SEAN COMBS,

Defendant.

$$-X$$

:

:

:

:

:

•

:

:

:

:

:

:

$$-X$$

## NOTICE OF MOTION

**PLEASE TAKE NOTICE** that Non-Party Warner Bros. Discovery, Inc. (“WBD”) upon the accompanying Memorandum of Law, Declaration of Thomas B. Sullivan dated April 8, 2025 and accompanying exhibits, and all prior pleadings and proceedings hereto, by its undersigned counsel, hereby respectfully moves this Court, before the Honorable Arun Subramanian, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 15A, New York, NY 10007, for an order quashing the subpoena *duces tecum* served on it by defendant Sean Combs and for such other and further relief as the Court may deem just and appropriate.

Dated: April 8, 2025

*Of Counsel:*

Paul J. Safier  
BALLARD SPAHR LLP  
1735 Market St., 51st Fl.  
Philadelphia, PA 19103  
Phone: (215) 665-8500  
Fax: (215) 864-8999  
safierp@ballardspahr.com

Respectfully submitted,

BALLARD SPAHR LLP

By: /s/ Thomas B. Sullivan  
Thomas B. Sullivan

1675 Broadway, 19th Floor  
New York, NY 10019-5820  
Phone: (212) 850-6139  
Fax: (212) 223-1942  
sullivant@ballardspahr.com

*Counsel for Non-Party Warner Bros. Discovery,  
Inc.*